

REMARKS

Claims 1-7 and 48-85 are now pending in the application. While Applicants disagree with the current rejections, Applicants have amended the claims to expedite prosecution. Applicants reserve the right to pursue the claims as originally filed in one or more continuing applications. Support for the amendments can be found throughout the written description, claims, and drawings as originally filed. Therefore, no new matter has been added. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

REJECTION UNDER 35 U.S.C. § 103

Claims 1-6, 48-50, 52-57, 59-61 and 63-85 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Pat. No. 6,662,253 ("Gary") in view of U.S. Pub. No. 2002/0184453 ("Hughes"). This rejection is respectfully traversed.

Claim 63 recites that the servo controller interface is connected and positioned between the servo controller and the first and second processors, the servo controller interface is directly connected to the servo controller and the first and second buses, and the servo controller interface does not include the first and second buses and the first and second processors.

Claim 1 recites that the speed matching module and the pipeline control modules are directly connected to the servo controller in between (i) the servo controller and (ii) the first processor and the second processors.

A. Gary does not show, teach, or suggest that the servo controller interface is connected and positioned between the servo controller and the first and second processors, the servo controller interface is directly connected to the servo controller and the first and second buses, and the servo controller interface does not include the first and second buses and the first and second processors.

The Examiner relies on FIG. 1 of Gary to disclose a first interface for communicating with a first processor 110 over a first bus 102 and a second interface for communicating with a second processor over a second bus 102. (See Page 8 of the Office Action mailed November 27, 2009, hereinafter "the Office Action). Applicants respectfully submit that the alleged servo controller interface of Gary does not include the limitations recited in claim 63.

For example, the Examiner states that the servo controller interface is a "combination of all elements within 103 except 105 and 108." (See Page 8 of the Office Action). In contrast, claim 63 recites that the servo controller interface does not include the first and second buses and the first and second processors. Accordingly, Applicants respectfully submit that

the Examiner can not merely rely on "all elements within 103" to disclose the servo controller interface.

As such, Gary fails to disclose that the relied upon servo controller interface is directly connected to the servo controller and the first and second buses and is directly connected to the first and second interfaces. For example, the Examiner relies on the "connection between processor 110 and bus 102" to disclose the first interface, and the "connection between processor 111 and bus 102" to disclose the second interface. (See Page 8 of the Office Action). Applicants respectfully submit that the relied upon servo controller interface is not directly connected to both the alleged first and second interfaces and the servo controller. Instead, other structure, such as bus 102, is connected between the servo controller interface and the alleged first and second interfaces. Applicants respectfully submit that structure is not directly connected when there is intervening structure.

Therefore, claim 63 is allowable for at least these reasons.

B. Gary does not show, teach, or suggest that the speed matching module and the pipeline control modules are directly connected to the servo controller, between the servo controller and the first and second processors.

The Examiner relies on FIG. 1 of Gary to disclose memory control 109, which includes a cache that purportedly corresponds to the speed matching module. (See Page 4 of the Office Action). Applicants respectfully submit that the memory control 109 is not directly connected to the servo controller between the servo controller and the first and second processors.

Instead, the memory control 109 is connected to the servo controller via MUX 205 and bus 114. Accordingly, the memory control 109 is not directly connected to the servo controller (i.e. relied upon servo control 108) as claim 1 recites. Further, the servo control 108 is connected to the processors 110 and 111 via buses 102 and 114 and MUX 205, not the memory control 109. Accordingly, the memory control 109 is not directly connected between the servo controller and the first and second processors as claim 1 recites.

Therefore, claim 1 is allowable for at least these reasons.

C. Hughes does not make up for the deficiencies of Gary.

The Examiner merely relies on Hughes to disclose processors operating at different rates. Applicants respectfully submit

that Hughes fails to make up for the deficiencies of Gary with respect to claims 1 and 63.

D. Claims 1 and 63 have limitations not taught by either reference.

It is a longstanding rule that to establish a *prima facie* case of obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. *In re Royka*, 180 USPQ 143 (CCPA 1974). See MPEP § 2143.03. For at least the above reasons, Applicants respectfully assert that claims 1 and 63 define over the cited art.

E. Other Claims.

Independent claim 52 is allowable for at least similar reasons as claim 1. Independent claims 71 and 79 are allowable for at least similar reasons as claim 63.

F. Dependent Claims.

Applicants respectfully note that claims 2-7, 48-51, 53-62, 64-70, 72-78, and 80-85 depend directly or indirectly from claims 1, 52, 63, 71, and 79 and therefore are allowable for at least similar reasons as claims 1, 52, 63, 71, and 79. Applicants' position with respect to claims 2-7, 48-51, 53-62, 64-70, 72-78, and 80-85 should not be understood as implying that no other reasons for the patentability of claims 2-7, 48-

51, 53-62, 64-70, 72-78, and 80-85 exist. Applicant reserves the right to address these other reasons at a later date if needed.

G. Other Rejections.

Claims 7, 51, 58, and 62 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gary in view of Hughes, as applied to claims 6 and 57 above, in further view of U.S. Pat. No. 6,754,274 ("Snyder"). This rejection is respectfully traversed.

Snyder do not remedy the deficiencies of Gary and Hughes with respect to claims 1, 52, and 61. Claims 7, 51, 58, and 62 ultimately depend from claims 1, 52, and 61 and therefore are in condition for allowance for at least similar reasons. Applicants' position with respect to claims 7, 51, 58, and 62 should not be understood as implying that no other reasons for the patentability of claims 7, 51, 58, and 62 exist. Applicants reserve the right to address these other reasons at a later date if needed.

CONCLUSION

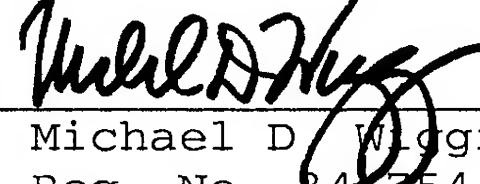
It is believed that all of the stated grounds of rejection have been properly addressed. For all of the reasons set forth above, Applicants submit that the application is in condition for allowance. Applicants therefore respectfully request that the Examiner reconsider and withdraw all presently outstanding rejections. By addressing particular positions taken by the Examiner in the above remarks, Applicants do not acquiesce to other positions that have not been explicitly addressed. In addition, Applicants' arguments for the patentability of a claim should not be understood as implying that no other reasons for the patentability of that claim exist.

If the Examiner believes that personal communication will allow any outstanding issues to be resolved, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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